

**AFFIDAVIT OF BRADLEY J. SCHRAM**

STATE OF MICHIGAN

COUNTY OF OAKLAND

1. My name is Bradley J. Schram, and the facts asserted herein are based on my own personal knowledge.
2. I proffer this Affidavit in support of Plaintiff Thomas E. Underwood's Motion for Class Certification in Underwood v. Carpenters Pension Trust Fund - Detroit and Vicinity Pension Plan ("Plan"), No. 2:13-cv-14464 (Hon. Lawrence P. Zatkoff, Senior U.S. District Judge) ["the Underwood Class Action"].
3. I received my undergraduate degree from the University of Michigan (A.B., Honors College, high distinction) in 1972.
4. I received my J.D. degree from Georgetown University Law Center ("Georgetown") in 1976.
5. While at Georgetown, I was the Senior and Managing Editor of the Georgetown Law Weekly, and I participated in the Trial Advocacy Program.
6. From August of 1976 until August of 1978, I was employed as an Assistant Prosecuting Attorney for Wayne County, Michigan.
7. In September 1979, I founded Hertz Schram PC (then a partnership, but later a professional corporation), known until early 2007 as Hertz, Schram &

Saretsky, P.C. The firm is located in Bloomfield Hills, Michigan.

8. I am a frequent lecturer on securities, commercial litigation and arbitration issues, and I have also lectured on the relationship between litigation and professional responsibility at the University of Detroit School of Law and Wayne State University Law School.

9. Additionally, I have actively participated in numerous securities and consumer protection class actions

10. Prior to the Underwood Class Action, I actively participated in the following class actions for benefits under a pension plan, all but one of which [number 13 below] was governed by ERISA:

List No.	Case Name
1	<u>Zimmer v. Henry House, Inc.</u> , No. 1:95-CV-318 (W.D. Mich.)
2	<u>Ramsey v. Amfac, Inc.</u> , No. C-95-4317 CAL (N.D. Cal.)
3	<u>McElwaine v. U.S. West, Inc.</u> , No. CV-96-00214-WDB (D. Az.)
4	<u>White v. Employee Retirement Plan of Amoco Corp. and Participating Cos.</u> , No. 96 C 4298 (N.D. Ill.)
5	<u>Lyons v. Georgia-Pacific Corp. Salaried Employees Retirement Plan</u> , No. 97-CV-0980-JOF (N.D. Ga.)
6	<u>Wimbush-Bowles v. GTE Service Corp. Plan for Employees' Pensions</u> , No. 98-0598-CIV-T-25 (M.D. Fla.)
7	<u>Gromala v. Royal &amp; Sun Alliance</u> , No. 01-72196 (E.D. Mich.)
8	<u>Crosby v. Bowater Incorporated Retirement Plan for Salaried Employees of Great Northern Paper Inc.</u> , No. 1:01-CV-683 (W.D. Mich.), and No. 1:05-CV-3478 (N.D. Ill.)

9	<u>Hampton v. Henry Ford Health System Pension Plan</u> , No. 04-70221 (E.D. Mich.)
10	<u>Humphrey v. United Way of the Texas Gulf Coast</u> , No. H-05-758 (S.D. Tex.).
11	<u>Stewart v. AT&amp;T Inc.</u> , No. 5:07-cv-318-H (W.D. Tex.)
12	<u>Stewart v. AT&amp;T Inc.</u> , No. 5:08-cv-272-H (W.D. Tex.)
13	<u>Fitzpatrick v. Michigan Public School Employees' Retirement System</u> , No. 06-1694-AA (Ingham County Circuit Court)

11. I am admitted in, and a member in good standing of, the State Bar of Michigan, State Bar of Florida, Washington, D.C. Bar, the United States District Courts for the Eastern and Western Districts of Michigan and the Northern District of Illinois, the United States Courts of Appeals for the Sixth and Eleventh Circuits, and the United States Supreme Court.

12. I have also been admitted to practice pro hac vice in the United States District Courts for the Northern District of Georgia, the Middle District of Florida, the Southern District of Texas, the Southern District of Ohio, the Western District of Texas, and the Northern District of California.

13. If I am asked, I can document all facts asserted in this Affidavit.

Signed 1/14, 2014.

  
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Bradley J. Schram